

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES

v.

NAPOLEON GONZALEZ

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1:21-CR-00117-JAW

**DEFENDANT’S UNOPPOSED MOTION TO ENLARGE
TIME FOR PREPARATION OF PRESENTENCE REPORT**

NOW COMES the Defendant, **Napoleon Gonzalez**, by and through the undersigned counsel, and pursuant to Fed. R. Crim. P. 45(b), respectfully requests that this Court enlarge the period of time for preparation of the presentence investigation report pursuant to Fed. R. Crim. P. 32(f)(1). In support of this request, the Defendant states as follows:

ARGUMENT

On August 18, 2023, the jury returned verdicts of guilty on all counts of the indictment in the above-captioned matter. United States Probation Officer Thomas Kilroy first contacted counsel about scheduling a presentence interview while counsel was on vacation during the last week of August and first week of September. Counsel and Officer Kilroy scheduled a presentence interview for Tuesday, September 26, but Mr. Gonzalez was confused about the date of the appointment and did not appear for the interview. Officer Kilroy, Mr. Gonzalez, and defense counsel were able to complete a presentence interview on October 26, 2023. Officer Kilroy requires additional time prior to his disclosure deadline to obtain financial and medical records pertaining to the Defendant.

Defense counsel therefore respectfully requests a thirty-day enlargement of the deadline for filing of the presentence report. Neither Assistant United States Attorney Jeanne Semivan nor United States Probation Officer Thomas Kilroy has any objection to this motion.

CONCLUSION

For the reasons set forth above, the Defendant, **Napoleon Gonzalez**, respectfully requests that this Court reset the deadline for filing of the presentence investigation report to December 6, 2023.

Dated: November 6, 2023

/s/ Harris A. Mattson
Harris A. Mattson, Esq.
Counsel for Napoleon Gonzalez

CERTIFICATE OF SERVICE

I, Harris A. Mattson, Esq., hereby certify that the foregoing Unopposed Motion to Enlarge Time for Preparation of the Presentence Report has been electronically sent to A.U.S.A. Jeanne Semivan for the Office of the United States Attorney on this 6th day of November, 2023.

/s/ Harris A. Mattson
Harris A. Mattson, Esq.
Counsel for the Defendant